

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

WOLFE CONSULTING L.L.C.

2022 JUL 25 PM 3:31

July 11th, 2022
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MOTION TO REQUEST INJUNCTIVE RELIEF

Kyle Wolfe v. Rory Thibault

2:22-cv-143

The *deformation* I am alleging, in accordance with 28 § U.S. Code 4010(1) occurred between October 8th, 2021 and July 11th, 2022. Limited presented evidence to the court, at this time, includes;

1. October 8th, 2021 in VTDigger Article "*Man arrested at the Vermont Statehouse after threatening House speaker*"
2. December 13th, 2021 in VTDigger Article "*Defendant who threatened House speaker released with several conditions*"
3. March 3rd, 2022 in VTDigger Article "*Rutland man accused of stalking House speaker released on new conditions*" and;
4. March 7th, 2022 in VTDigger Article "*Social media posts lead to new charge against accused stalker of House speaker*"

Each one of the above-cited, and referenced, VTDigger articles, printed on May 5th, 2022 (05/10/2022) was "By" VTD Editor.

This *Libel* and the resulting *Slander*, has rendered, or made, me virtually unemployable, especially in my specific field of study and work. My resume is worth \$20.00/hour in a residential setting and \$55k/year managing a court-program, in Vermont. I am also a published author. I am the author of a three-part series, based in clinical psychology, about working with people to avoid incarceration/punitive sanctions if possible. One of the underlying "conditions" I work with is mental-health diagnoses. I have worked with many of the most severe cases of people receiving mental healthcare in Vermont with great success. This is indicated on my resume, available on my website online. My substance use stats and success is shown/indicted on the Vermont General Assembly's Website:

<https://legislature.vermont.gov/Documents/2020/WorkGroups/House%20General/Bills/H.783/Public%20Comment/H.783~Kyle%20Wolfe~Brief%20Preface%20to%20Comments%20and%20Documents~5-19-2020.pdf>

The injured party, I, Kyle T. Wolfe (AS Human Services) is seeking *injunctive-relief* from any and all deformation, *presented* in the above-cited published articles by VTDigger and "VTD Editor". I would like the above-referenced *person(s)/public figure(s)* to **Cease and Desist** such forms of speech, considered by the *Plaintiff*, as both *untrue* and *damaging*, to both my *personal* and *professional* reputation.



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July 11th, 2022.

I am withholding the right to seek compensation from damages for such *acts* described in 13 V.S.A. § 1457 for now. However, I am withholding that right. Under 13 V.S.A. § 1457, and 13 V.S.A. § 1455 subsequently, people whom have pre-existing mental-health diagnoses, or “drug-addiction” (21 V.S.A. § 495d(7) “Physical or mental impairment”), are intitled to protection from **hate-motivated** crimes, and sperate from any criminal proceedings, are protected by **civil-enforcement**. In this case, the *plaintiff* respectfully asks the court to put-in-place a **Cease-and-Desist** order that limits the *Defendant(s)* speech to prevent **deformation** the damaging, or potentially damaging, *slander*, that resulted in *libel*, and damages, that are at this time, **Per-Se**, and not *quantified[able]*.

As such, the *plaintiff*, Kyle T. Wolfe (AS Human Services), respectfully asks the court to order compensation, in the form of *injunctive-relief*; a **Cease-and-Desist Order**.

Yours truly “Pro-Se” *Plaintiff*,

Kyle T. Wolfe (ktw)

07/22/2022

Kyle T. Wolfe (AS Human Services)
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